

1 MORGAN, LEWIS & BOCKIUS LLP
2 HOWARD HOLDERNESS, State Bar No. 169814
3 DENNIS J. SINCLITICO, JR., State Bar No. 240260
4 One Market, Spear Street Tower
5 San Francisco, CA 94105-1126
6 Tel: 415.442.1000
7 Fax: 415.442.1001
8 E-mail: dsinclitico@morganlewis.com

9 Attorneys for Defendants
10 Cisco Systems, Inc., Venu Dharmapuri, and Kenny
11 Paul

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 ANOOP RAJKUMAR,

16 Plaintiff,

17 vs.

18 CISCO SYSTEMS, INC., VENU
19 DHARMAPURI, and KENNY PAUL, et
20 al.,

21 Defendants.

Case No. C08-01600-PVT

RULE 26(f) REPORT

22 PURSUANT TO Federal Rule of Civil Procedure 26, Defendants Cisco Systems, Inc. ("Cisco"),
23 Kenny Paul, Venu Dharmapuri, Deloitte Consulting LLP ("Deloitte"), and Wipro Technologies
24 ("Wipro") (collectively, "Defendants") and Plaintiff Anoop Rajkumar (collectively, "the Parties")
25 met and conferred and hereby submit this report in advance of the Case Management Conference
26 currently on calendar for August 5, 2008. Defendant Naval Mohta recently filed an answer with
27 the Court. As of this writing, his attorney has not responded to counsel's attempts to speak with
28 him.

1. The Parties agreed to exchange initial disclosures within 14 days after all
defendants have answered the complaint. The Parties agreed that written discovery will

1 commence within 30 days after all defendants have answered the complaint.

2 2. At this time, the parties do not believe discovery needs to be conducted in phases.

3 3. At this time, the parties believe that producing any relevant, electronically stored
4 information in hard copy form will be the most efficient means for production.

5 4. The parties are not aware of any unusual claims of privilege or of protection.

6 5. The parties do not presently anticipate any need for limiting discovery as set forth
7 in the Federal Rules of Civil Procedure and Local Rules of Court.

8
9
10 DATED: 07/23/08

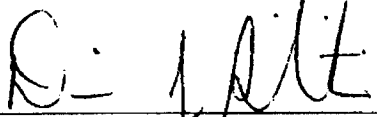


ANOOP RAJKUMAR

11
12 Plaintiff, Pro Se

13 Dated: July 17, 2008

MORGAN, LEWIS & BOCKIUS LLP

14
15
16 By 

Dennis J. Sinchico, Jr.

17 Attorneys for Defendants
18 Cisco Systems, Inc., Venu Dharmapuri, and
19 Kenny Paul

20 BELLO, BLACK & WELSH LLP

21
22 DATED: _____

23 JOSIAH (JOSH) BLACK

24 Attorney for Wipro Technologies

25 ///

26 ///

27 ///

28 ///

1 commence within 30 days after all defendants have answered the complaint.

2 2. At this time, the parties do not believe discovery needs to be conducted in phases.

3 3. At this time, the parties believe that producing any relevant, electronically stored
4 information in hard copy form will be the most efficient means for production.

5 4. The parties are not aware of any unusual claims of privilege or of protection.

6 5. The parties do not presently anticipate any need for limiting discovery as set forth
7 in the Federal Rules of Civil Procedure and Local Rules of Court.

8
9
10 DATED: _____

11 ANOOP RAJKUMAR

12 Plaintiff, Pro Se

13 Dated: July 17, 2008

14 MORGAN, LEWIS & BOCKIUS LLP

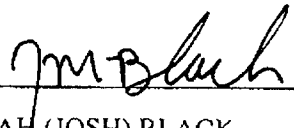
15
16 By 

Dennis J. Sinchico, Jr.

17 Attorneys for Defendants
18 Cisco Systems, Inc., Venu Dharmapuri, and
19 Kenny Paul

20 BELLO, BLACK & WELSH LLP

21 DATED: July 18, 2008

22 
23 JOSIAH (JOSH) BLACK

24 Attorney for Wipro Technologies

25 ///

26 ///

27 ///

28 ///

MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
SAN FRANCISCO

DB220766229.1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORRICK, HERRINGTON & SUTCLIFFE LLP

DATED: July 23, 2008

Patricia K. Gillete

PATRICIA GILLETE

Attorney for Deloitte Consulting